

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

New York Immigration Coalition et al.,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United States, in his official capacity, et al.

*Defendants.*

**CIVIL ACTION NO:  
25-cv-01309-MMG**

**PLAINTIFFS' MOTION FOR LEAVE TO FILE  
A SECOND AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a) and consistent with the Court's Order, ECF No. 41, Plaintiffs hereby move for leave to file a Second Amended Complaint, attached as Exhibit 1. Plaintiffs' proposed Second Amended Complaint introduces four amendments: it adds class allegations; one new cause of action; one new plaintiff; and it updates factual allegations. Pursuant to Local Rule 15.1, attached as Exhibit 2 is the redlined version of Plaintiffs' Amended Complaint, demonstrating the intended amendments. Plaintiffs' Proposed Order Granting Plaintiffs' Motion for Leave to File a Second Amended Complaint is attached as Exhibit 3.

As set forth in Plaintiffs' accompanying Memorandum of Law in Support of Their Motion for Leave to File a Second Amended Complaint, each of the amendments is brought in good faith, is timely filed, and will not prejudice Defendants.

WHEREFORE, Plaintiffs respectfully request that their motion for leave to file a Second Amended Complaint be granted.

Dated this 9<sup>th</sup> day of July, 2025

Respectfully submitted,

By: Ia/Mariana C. Lopez  
Mariana C. Lopez  
Francisca D. Fajana  
Cesar Z. Ruiz  
Michael Asparrin\*  
LatinoJustice PRLDEF  
475 Riverside Drive, Suite 1901  
New York, NY 10115  
212.319.3360  
Mlopez@latinojustice.org  
FFajana@latinojustice.org  
CRuiz@latinojustice.org  
MAsparrin@latinojustice.org

\*Admission Application forthcoming